BEFORE THE FEDERAL COMMUNICATIONS COMMISSION WASHINGTON, DC 20554

In the Matter of))
Flat Wireless, LLC, for and on behalf of its Operating Subsidiaries,	EB Docket No. 15-147 File No. EB-15-MD-005
Complainant,))
v.))
Cellco Partnership d/b/a Verizon Wireless, and its Operating Subsidiaries,)))
Defendant.)

VERIZON'S SECOND SUPPLEMENTAL RESPONSE TO INTERROGATORY NO. 5

By agreement with Flat, Verizon supplements its response to Interrogatory No. 5 filed on August 26, 2016 to provide pricing information for unlimited data plans that are no longer being offered by Verizon but are still active on the Verizon network. The lowest priced rate plan that includes unlimited data is a single line plan at \$34.99 with 300 minutes of talk time, but no included text messages. The unlimited data add-on costs \$49.99 per month bringing the total plan price to \$84.98 per month. Verizon stopped offering unlimited data for sale in July 2011.

Respectfully submitted,

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Christopher M. Miller Tamara L. Preiss Andre J. Lachance VERIZON 1300 I Street, N.W. Suite 400 West Washington, D.C. 20005 (202) 515-2400 Steven G. Bradbury Hrishikesh N. Hari DECHERT LLP 1900 K Street, N.W. Washington, D.C. 20006

(202) 261-3483

Counsel for Verizon

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Defendant.))

SECOND SUPPLEMENTAL DECLARATION OF JOSEPH M. GRIFFIN

- 1. My name is Joseph M. Griffin, and I am employed by Verizon. My responsibilities include developing and maintaining Verizon's consumer retail wireless plans.
- 2. The purpose of my declaration is to provide additional information as part of Verizon's response to Interrogatory No. 5 of Flat Wireless LLC in this matter.
- 3. I have reviewed the retail information provided in Verizon's Supplemental Response to Flat's Interrogatory No. 5 and declare that the information is true and correct based on information available to me.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: August 31, 2016

CERTIFICATE OF SERVICE

I hereby certify that on this 31st day of August, 2016 copies of the foregoing filing and declarations attached hereto were delivered by electronic mail to the following individual:

Donald J. Evans Fletcher, Heald & Hildreth, P.L.C. 1300 N. 17th Street, Suite 1100 Arlington, VA 22209

Hrishikesh N. Hari